

Montana Department of
Public Health & Human Services

Section:
Serving the Family

CHILD CARE

Subject:
Change Reporting

Supersedes: Child Care 6-5 (5/1/05)

References: Sections 52-2-701-704, 52-2-711-713, 53-4-6ten MCA;
Sections 37.80.ten1-ten3, 37.80.201-202, 37.80.205-206, 37.80.301-302,
37.80.305 -306, 37.80.315-316, 37.80.501 ARM
45 CFR Part 98

**Change
Reporting
Requirements**

Income eligible families receiving a Best Beginnings Child Care Scholarship based on work/school/FIA activities shall report any change in circumstance, which may affect their eligibility or their need for child care to the Child Care Resource and Referral (CCR&R) agency within ten days of knowing the change. Changes reported to the CCR&R by telephone shall be followed up in writing by the parent within ten days.

Reporting changes to other DPHHS or State entities is not adequate. The report must be made to the CCR&R. However, the CCR&R may accept a copy of the participant's written change notice submitted to another agency, in lieu of the Change Report Form (DPHHS-HCS/CC-016), if the information satisfies the CCR&R's need for information.

EXAMPLE: A parent participating in the TANF program reports an address change to the WoRC office. The CCR&R may accept a facsimile of the change report provided to the WoRC office.

If the change is reported by telephone, the CCR&R Eligibility Specialist shall follow up by sending the Change Report Form (DPHHS-HCS/CC-016) to the parent to confirm the change, sign, and return it to the CCR&R.

⇒ Case note the change report and request confirmation on Change Report Form (DPHHS-HCS/CC-016).

Families should use the Change Report Form (DPHHS-HCS/CC-016), to report changes to their CCR&R Eligibility Specialist. The form reminds parents of the reporting requirements:

- ☐ Change in employment of any household member;
- ☐ Loss of employment to less than the minimum hourly work requirement;

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- ☐ The addition or loss of a household member;
- ☐ A change in mailing or residence address;
- ☐ A change in school attendance;
- ☐ A change in child care provider (report immediately); and
- ☐ Entering or leaving the TANF Cash program.

A child care certification plan may be modified or terminated at any time. When the CCR&R Eligibility Specialist makes a change in a Best Beginnings Child Care Scholarship, the parent shall be notified in writing. When the CCR&R or State takes an adverse action, a notice is mailed to the parent ten days before the action.

**CCR&R
Evaluates the
Change**

If any change in circumstance is not prospected when eligibility is determined, the change must be evaluated when reported to the CCR&R. Depending on the change circumstances, the family may:

- ☐ Make adjustments to allow Best Beginnings Child Care Scholarship to continue for their child:
 - Change in child care provider;
 - Child moves to another Best Beginnings Child Care Scholarship household; or
 - If the family moves within a different Montana CCR&R District, the Eligibility Specialist must redetermine eligibility when the family contacts the new CCR&R.
- ☐ Benefit from a change which increases their Best Beginnings Child Care Scholarship:
 - Request more child care hours;
 - Request a lower co-payment, because income decreased or household size increased.
 - ⇒ Run a what-if scenario.
- ☐ Postpone some changes which decrease their Best Beginnings Child Care Scholarship:
 - A change in income is not to be considered until re-certification unless it benefits the family; or
 - The loss of a household member unless a child moves to another Best Beginnings Child Care Scholarship household.

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- ❑ Lose eligibility for the Best Beginnings Child Care Scholarship:
 - Loss of TANF Cash eligibility;
 - A teen parent is no longer attending high school (or meeting the work requirement);
 - The parent is not meeting the minimum hourly work requirement;
 - A household change relieves the need for child care;
 - A change in work schedule relieves the need for child care;
 - The child care provider is not certified for payment; or
 - Parent fails to pay co-payment.

Case Notes

Whenever the CCR&R Eligibility Specialist considers a change, the assessment shall be documented in case notes if the information is not somewhere else in the system. Case notes shall be made at, but not limited to, the following stages while serving a family:

- ❑ Eligibility determination;
- ❑ Change reports (any relevant communication); and
- ❑ Scholarship closure.

Include information regarding eligibility including, but not limited to, the following assessments:

- ❑ Household membership;
- ❑ Income; and
- ❑ Activities (parent & child schedules).

There is no need to repeat information captured elsewhere in the system unless further explanation is needed.

EXAMPLE: A parent fails to recertify and there has been no communication between the parent and the CCR&R, other than routine notice mailings. The Eligibility Specialist closes the case using “Failed to Complete Application/Re-certification” as the reason. Assuming there are no other circumstances to report, the closure reason is adequate.

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What-If Scenario

The net effect of some Non-TANF household changes may not be clear. For example, a parent may return to the household, bringing a nominal amount of income to the household. The Child Care Resource and Referral Eligibility Specialist may present options to the family:

- ⇒ Run a what-if scenario by entering the household change(s), including the income and the proposed child care hours.
- ⇒ Present the family with the option of keeping the current arrangement or incorporating the changes.
- ⇒ If the household change benefits the family, the family may choose to re-determine eligibility and a request a new child care certification plan, which will have the same end-date as the original certification plan.
- ⇒ If the change is not favorable to the family, the CCR&R should counsel the family regarding the pending impact of the household change at re-certification time.
- ⇒ Case note.

Failure to Change Report

The CCR&R Eligibility Specialist shall evaluate changes that were not reported in a timely manner. While the parent has an obligation to report changes within ten days, the consequence of not reporting depends on whether the change causes a loss of basic eligibility. Failure to report, in itself, does not cause eligibility to be lost. Income changes generally do not create basic eligibility issues during the certification span. However, the failure to meet the work requirement does create a basic eligibility issue. If the work requirement is not being met, the CCR&R Eligibility Specialist should communicate to the family the Continuity of Care Policies as outlined in Section 6-6.

Assuming income was prospectively correctly when eligibility was determined, the increase in income does not affect the family's eligibility during the certification span. The family maintains basic eligibility when income fluctuates during the certification plan. Failure to report the income change before recertification may simply result in a family losing eligibility, under short notice, when the family recertifies.

The change in employment does raise a question about basic eligibility. A family no longer meeting the work requirement loses eligibility, however, we

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allow ten days for change reporting.

If the parent reports an employment change within ten days, and:

- ❑ income decreases, the parent may be eligible for a lower co-payment; or
- ❑ if income increases, the parent may be counseled regarding a future increase in co-payment or future eligibility loss occurring at recertification time; or
- ❑ if employment is lost, the parent may be eligible for a Grace Period.

If the parent fails to report an employment change within ten days, and:

- ❑ the parent takes another job to meet the work requirement within ten days, the parent still maintains basic eligibility; the parent is re-employed before the allowed reporting period expires. The employment change does not cause eligibility to be lost. Nor does failure to report cause eligibility to be lost. In this situation, the parent would not be subject to overpayment for this period, assuming child care is used for appropriate activities; or
- ❑ If unemployment extends beyond ten days without a change report, the parent loses eligibility. The parent also loses the opportunity to apply for the grace period. The parent's failure to report unemployment delays the CCR&R's knowledge of the family's ineligibility; the child care scholarship must be closed. After eligibility is lost, any further use of the child care scholarship is subject to overpayment. Any subsequent employment does not rekindle eligibility unless the family reapplies.

Change	Policy
Child is Temporarily Absent	Remove a child's needs from the household if he/she is gone from the home for more than 30 days. ⇒ If the only eligible child in a child care scholarship is gone from the home for 30 days, close the child care scholarship. ⇒ If one child, of two or more eligible children, in a household is gone for

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	<p>more than 30 days, remove his/her needs from the child care scholarship.</p> <p>⇒ Case note.</p> <p>EXAMPLE: A mother has a work related training that takes her away from home for a week. Her child stays with a family friend for the week. The child care scholarship remains valid during the temporary absence.</p> <p>EXAMPLE: Children live with one parent for the school year and the other parent for the summer. If they are absent from one residence for more than 30 days, the respective child care scholarship will close.</p>
Child Moves In or has Newborn	<p>A new child may join a participating household without being placed on the Non-TANF waiting list.</p> <p>⇒ Verify household membership;</p> <p>⇒ Add the child and his/her needs to the household;</p> <p>⇒ Re-determine eligibility; and</p> <p>⇒ Case note.</p>
Child Moves Out	<p>A child who moves to another household for more than 30 days shall be removed from the previous child care scholarship household and considered part of the new household. If the new household needs help with child care, a new separate scholarship application is required.</p> <p>NOTE: A child may concurrently participate in two households.</p> <p>⇒ Case note.</p>
Child Support	<p>A change in the CSED case, whether it is open or closed during eligibility must be reported to the CCR&R within 10 days of the date it happened. A change in the amount of support received through a court order must be reported within 10 days of the date it happened. A change in any circumstances related to the</p>

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	parent's Good Cause must be reported within a 10 day time period of the change.
Family Moves	<p>A family that moves to another location in Montana may maintain eligibility during the move. All reporting requirements apply, however, the move, in itself, does not cause a family to lose eligibility. If a parent changes jobs within the ten-day reporting period, the parent may maintain eligibility.</p> <p>The child care scholarship may be transferred to a new Eligibility Specialist within Montana. The CCR&R Eligibility Specialist must re-determine eligibility.</p> <ul style="list-style-type: none"> ⇒ Verify and update new address; ⇒ CCR&R Eligibility Specialists shall contact each other to coordinate the move; ⇒ CCR&R Eligibility Specialist shall re-determine eligibility; and ⇒ Case note. <p>NOTE: A family who moves out of Montana loses eligibility for Montana's Best Beginnings Child Care Scholarship.</p>
Head-of-Household Change	<p>A change in the head-of-household does not create a break in eligibility, as long as, all other eligibility factors are maintained.</p> <ul style="list-style-type: none"> ⇒ Verify household membership; and ⇒ Case note household changes in both cases.
Household Member Moves Out	<p>A decrease in household size, which was not prospected when eligibility was determined, does not affect eligibility or the co-payment until re-certification time.</p> <ul style="list-style-type: none"> ⇒ Verify household membership; ⇒ File the change report form for reference at re-certification; and ⇒ Case note.

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Income Decreases	<p>If a Non-TANF family's income decreases and they request to have their co-payment lowered, evaluate the family's work hours and income. Prospect the next month's co-payment accordingly:</p> <ul style="list-style-type: none"> ⇒ Verify income change; ⇒ Adjust the certification plan to coordinate with the need for child care based on family's work hours; ⇒ Reevaluate the family's income to prospect a lower co-payment; ⇒ Provide the '<u>Request Grace Period . . .</u>' application to the family <ul style="list-style-type: none"> ○ If the grace period is applicable, maintain the child care hours for 30 days ○ If the grace period does not apply, reduce the child care hours to reflect the new work & school schedule; ⇒ Notify the parent and the provider of the change or closure <ul style="list-style-type: none"> ○ If the family no longer meets the work requirement, close the child care; and ⇒ Case note.
Income Increases	<p>An increase in income, which was not prospected when eligibility was determined, does not affect eligibility or the co-payment until re-certification time.</p> <ul style="list-style-type: none"> ⇒ File the change report form for reference at re-certification; ⇒ Adjust the certification plan, if needed, to coordinate with the need for child care based on family's work hours; and ⇒ Case note. <p>NOTE: If income was not prospected correctly, the eligibility specialist shall reevaluate eligibility based on the correct information.</p>
Parent Moves In	<p>When a parent is added to the household, the family size increases and household income may increase. The Eligibility Specialist may run a what-if scenario and present options to the family:</p> <ul style="list-style-type: none"> ⇒ Run a what-if scenario by entering the household change(s), including

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	<p>the income and the proposed child care hours.</p> <ul style="list-style-type: none"> ⇒ Present the family with the option of keeping the current arrangement or incorporating the changes. ⇒ If the household change benefits the family, the family may choose to re-determine eligibility and request a new child care certification plan. ⇒ If the change is not favorable to the family, the CCR&R should counsel the family regarding the pending impact of the household change at re-certification time. ⇒ Case note.
Parent Moves Out	<p>When a parent moves out of the household, the need for a child care scholarship may increase.</p> <ul style="list-style-type: none"> ⇒ Re-determine eligibility, if a lower co-payment is desired; and ⇒ Case note. <p>Parents in the process of divorce or separation may individually continue participation under separate households, as long as all other eligibility factors are maintained.</p> <p>NOTE: A child may concurrently participate in two households.</p>
Provider Change	<p>The parent may choose a new child care provider at any time. The child care certification plan links the child/family to the child care provider. The child care certification plan must list the child's current provider before a Best Beginnings Child Care Scholarship can be issued. The parent should plan ahead when changing child care providers and notify the CCR&R prior to the provider change or within one business day of the change. The CCR&R may accept child care provider changes done by phone, if the parent is the person noticing the CCR&R by phone.</p> <ul style="list-style-type: none"> ⇒ Adjust the certification plan to reflect the new provider, maintaining the same end-date and eligibility information;

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	<ul style="list-style-type: none"> ⇒ The CCR&R Eligibility Specialist should write the new provider change on a Child Care Service Plan, date the effective date of the change, date when notice of the change was received, initial the change and keep a copy in the family's file; ⇒ The new certification plan will serve as notification to the parent and to the new provider ; and ⇒ Case note. <p>NOTE: The parent & the child care provider are responsible for notifying each other of changes. They are responsible for any notice obligations or agreements between them.</p> <p>If the parent fails to notify the CCR&R of a provider change within one business day, the parent is responsible for the cost of care at the new provider/facility until such change is reported to the CCR&R. The CCR&R will not make changes to the certification plan until notified either by phone or in writing by the parent, of the new provider change. Provider changes on certification plans should not be backdated to the actual date of the change if the CCR&R did not receive appropriate notice of the change. The certification plan should reflect the date the CCR&R was notified by the parent or the effective date of the change in provider; whichever is later. Case note the circumstances.</p> <p>NOTE: In a situation where the parent failed to notify the CCR&R of a change in provider, the existing provider may bill Certified Enrollment days for the period between when care stopped at the existing provider and the parent reported the change of a new provider to the CCR&R if the existing provider thought the child would return to their facility. The parent is responsible for any notice or payment obligation to the previous child care provider.</p>
Provider Not	The provider is not certified to receive State payment:

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Certified for Payment	<ul style="list-style-type: none"> ⇒ End the certification plan; ⇒ Notify the parent and provider; ⇒ Case note; and ⇒ If TANF Cash, notify WoRC Case Manager via e-mail.
Teen-Parent No Longer in School	<p>A teen-parent, participating in the Non-TANF program, who no longer attends school may continue receiving a child care scholarship if he/she meets the work requirement.</p> <ul style="list-style-type: none"> ⇒ If the parent is meeting the work requirement, change the reason for care to 'Working'. ⇒ If the parent is not meeting the work requirement, close the child care scholarship. ⇒ Case note.
Teen-Parent On Summer Break	<p>A teen-parent may maintain eligibility for child care scholarship if they meet the work requirement during summer break.</p> <ul style="list-style-type: none"> ⇒ Use 'Working,' as the reason for care for the summer. ⇒ Case note. <p>The child care scholarship will be closed for the teen-parent who does not meet work requirements during the summer. The teen-parent may reapply when returning to school.</p>
Work Requirement Not Met	<p>A reduction in work hours to less than the minimum hourly work requirement.</p> <ul style="list-style-type: none"> ⇒ Provide the 'Request Grace Period . . .' application to the family <ul style="list-style-type: none"> ○ If the grace period is applicable, set the certification plan to end in 30 days following employment loss. ○ If the family no longer meets the work requirement and the grace period is not applicable, close the child care. ⇒ Notify the parent and provider of the closure date.

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	⇒ Case note.